

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIFETRADE LITIGATION:

This Document Relates to: ALL ACTIONS

CIVIL ACTION NO.

1:17-cv-02987-JPO-KHP

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
AND SHAREHOLDER DERIVATIVE PARTIAL SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 23(e) and 23.1 and this Court's Order Preliminarily Approving Partial Settlement and Providing for Notice dated December 10, 2022 (Dkt. 600), and upon (i) the Joint Declaration of Steven J. Phillips and Charles S. Siegel in Support of (I) Plaintiffs' Motion for Final Approval of Class Action and Shareholder Derivative Partial Settlement and Plan of Allocation, and (II) Plaintiffs' Motion for Award of Attorney's Fees, Reimbursement of Expenses, and Compensatory Award; (ii) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action and Shareholder Derivative Partial Settlement and Plan of Allocation; and (iii) all other papers and proceedings herein, Plaintiffs Hugo Leonardo Carlini, Martin Ricardo Miranda, Carlos Alberto Wehbi, Miguel Fernandez Moores, Carlos Adrian Ferretti, and Daniel Ergasto Gomez Cusco ("Class Representatives"), individually and on behalf of all other persons similarly situated, and Plaintiffs Hugo Leonardo Carlini, Martin Ricardo Miranda, Carlos Alberto Wehbi, and Miguel Fernandez Moores ("Derivative Plaintiffs"), derivatively on behalf of The Lifetrade Fund B.V., LTrade Plus Ltd. and LTrade Fixed Capital (BVI) Ltd. (collectively, the "Lifetrade Funds") (as defined in the Stipulation and Agreement of Settlement, dated August 4, 2021, the "Stipulation") (collectively, Plaintiffs), hereby move this Court, before the Honorable J. Paul Oetken, on March 21, 2022, at 11:00 a.m., telephonically, or at such other location and time as set by the Court, for

an entry of Judgement approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. A proposed Judgment and Order granting the requested relief will be submitted with Plaintiffs' reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: February 14, 2022

Respectfully submitted,

/s/ Steven Phillips

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CERTIFICATE OF SERVICE

I, Steven Phillips, a lawyer admitted to practice in this Court, hereby certify that, on February 14, 2022, I caused the foregoing document to be filed with the Clerk of the Court and served upon all counsel of record via the CM/ECF system.

/s/ Steven Phillips
Steven Phillips